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August 19, 2020

Hon. Sidney H. Stein United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, NY 10007

MEMO ENDORSED

Filed on ECF and sent via email to Laura_Blakely@nysd.uscourts.gov

Re: *United States v. Jose Adames* 19 Cr. 76 (SHS)

Dear Judge Stein:

We represent the defendant, Jose Adames, pursuant to the Criminal Justice Act. Mr. Adames was sentenced by Your Honor on January 28, 2020 to 16 months imprisonment. He was originally supposed to surrender to CI Moshannon Valley on March 27, 2020. Since then, your Honor has adjourned Mr. Adames surrender date twice based on the COVID-19 pandemic. His surrender date is currently August 28, 2020. We write now to request an additional adjournment of at least 90 days on this same basis. We submit that the risks associated with the continued spread of COVID-19 through the federal prison system warrant an adjournment of Mr. Adames' surrender date, particularly when weighed against the lack of risk of flight and lack of danger to the community posed by his continued release. We have conferred with the Government and they have no objection to this request.

Respectfully submitted,

Sarah M. Sacks ' Bennett M. Epstein

Sarah M. Sacks

cc: AUSA Kyle Wirshba (by email)

The defendant's surrender date is adjourned to Nov. 30, 2020.

Dated: New York, New York August 20, 2020

IDNEY H. STEIN